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13 Plaintiff  
14 THE SAUL ZAENTZ COMPANY d/b/a Middle-  
15 earth Enterprises, a Delaware corporation

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

FOURTH AGE LIMITED, *et al.*,

Plaintiffs,

v.

WARNER BROS. DIGITAL  
DISTRIBUTION, INC., *et al.*,

Defendants.

Case No.: 12-9912-ABC (SHx)

*Hon. Audrey B. Collins*  
*Hon. Mag. Stephen J. Hillman*

**DISCOVERY MATTER**

**ZAENTZ'S STATMENT IN  
OPPOSITION TO MOTION FOR  
PROTECTIVE ORDER RE  
TRANSCRIPT OF DEPOSITION  
OF PRISCILLA TOLKIEN**

[Fed. R. Civ. P. 37(a) & L.R. 37-2.3]

**Hearing Date & Time:** June 30,  
2014, 2:00 p.m, 550-Roybal

**Discovery Cut-Off:** July 29, 2014

THE SAUL ZAENTZ COMPANY

Counterclaim Plaintiff,

v.

FOURTH AGE LIMITED, *et al.*

Counterclaim  
Defendants,


1 Defendant and Counterclaim-Plaintiff The Saul Zaentz Company ("Zaentz")  
 2 submits the following statement in support of Warner's opposition to the Tolkien/HC  
 3 Parties' attempt to designate all but thirty pages of Priscilla Tolkien's deposition  
 4 transcript as confidential. *See* ECF 181, at 14-24. Zaentz fully joins Warner's  
 5 statements in the Joint Stipulation and thus sees no need to restate or paraphrase them  
 6 here. To the extent the Tolkien/HC Parties have suggested that Zaentz's absence as a  
 7 party to the objection and subsequent Joint Stipulation suggests any degree of support  
 8 for the Tolkien/HC Parties' motion (*id.* at 7 & n.5), Zaentz expressly refutes such  
 9 inference.

10 In addition, Zaentz was surprised to see in the Tolkien/HC Parties' portion of  
 11 the Joint Stipulation the contention that Zaentz had designated certain materials as  
 12 "Attorney's Eyes Only" without justification (thereby justifying the Tolkien/HC  
 13 Parties' over-designation of Ms. Tolkien's testimony), and that motion practice  
 14 concerning this issue would likely ensue. ECF 181, at 3 & n.4; *id.* at 13. These  
 15 statements came as a surprise because the Tolkien/HC Parties had never previously  
 16 directly raised such a concern with Zaentz (and still have not done so to date).  
 17 Should the Tolkien/HC Parties choose to raise such concerns with Zaentz, Zaentz will  
 18 endeavor to respond promptly and avoid burdening the Court with unnecessary  
 19 motion practice.

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 21 Dated: June 16, 2014

ARNOLD & PORTER LLP

22 By:

  
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 26 Counterclaim Plaintiff THE SAUL  
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